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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

)	
KINTETSU WORLD EXPRESS (U.S.A.), INC.,)	
)	
Plaintiff,)	1:21 Civ. 9579 (JHR)(JW)
)	
- v. -)	
)	<u>DECLARATION OF</u>
DIALECTIC DISTRIBUTION LLC,)	<u>CASEY WALTERS</u>
)	
Defendant.)	
)	

STATE OF ARIZONA)
 } SS:
COUNTY OF MARICOPA)

I, Casey Walters, declare under penalty of perjury as follows.

1. I am an attorney-at-law admitted to practice before the Courts of the State of Arizona. I am corporate counsel for Kintetsu World Express (U.S.A.) Inc. (“KWEUSA”), the plaintiff herein. I am authorized to make this declaration on behalf of KWEUSA, and I have personal knowledge of the matters stated herein.

2. I make this declaration concerning the status of certain purported witnesses named by the defendant, Dialectic Distribution LLC.

3. I was informed that the defendant’s counsel expressed an intention to seek depositions of Olaf Gerber, Stijn Buggenhout, Tetsuhiro Matsuno, Rocky Zhou, David Qi and Takashi Miyagi. I undertook to ascertain the employment status of each of these people within the Kintetsu World Express Group entities.

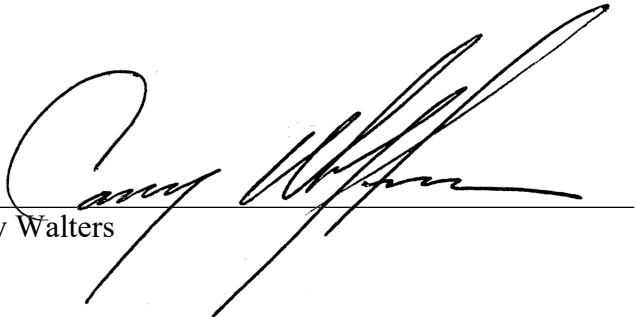
4. Olaf Gerber was at no time an employee of KWEUSA. He was once, but is no longer, employed by Kintetsu World Express (Deutschland) GmbH.

5. Stijn Buggenhout was at no time an employee of KWEUSA. He was and is an employee of Kintetsu World Express (Benelux) BV.

6. Rocky Zhou and David Qi were at no time employees of KWEUSA. It is my understanding that they were and remain employees of Kintetsu World Express (China) Co., Ltd.

7. KWEUSA does not own or control Kintetsu World Express (Deutschland) GmbH, Kintetsu World Express (Benelux) BV or Kintetsu World Express (China) Co., Ltd.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2024.


Casey Walters